

LOCAL BANKRUPTCY FORM 9013-4

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Russel P. Blust, aka Russel P. Blust, Sr.

Debtor

U.S. BANK NATIONAL ASSOCIATION , AS
TRUSTEE FOR BEAR STEARNS ASSET
BACKED SECURITIES TRUST 2004-AC3,
ASSET-BACKED CERTIFICATES, SERIES
2004-AC3

Movant

v.

Russel P. Blust, aka Russel P. Blust, Sr.

Charles J. DeHart, III, Esq., Trustee

Respondents

CHAPTER 13

CASE NO. 15-02826 HWV

Nature of Proceeding:

Motion for Relief from Stay

Document #:87

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance: Requested by Debtor's Attorney

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: December 16, 2019

/s/ Jill Manuel-Coughlin, Esquire

Jill Manuel-Coughlin, Esquire

Attorney for Movant

Phone Number: 215-942-2090

¹ No alterations or interlineations of this document are permitted.

² If this is not a first request for a continuance, then a Motion to Continue must be filed.